

Kenneth A. Gallo (*pro hac vice*)  
Joseph J. Simons (*pro hac vice*)  
Craig A. Benson (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7356  
Facsimile: (202) 204-7356  
Email: kgallo@paulweiss.com  
Email: jsimons@paulweiss.com  
Email: cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)  
Jonathan A. Patchen (SBN 237346)  
TAYLOR & COMPANY LAW OFFICES, LLP  
One Ferry Building, Suite 355  
San Francisco, California 94111  
Telephone: (415) 788-8200  
Facsimile: (415) 788-8208  
Email: staylor@tcolaw.com  
Email: jpatchen@tcolaw.com

*Attorneys for Plaintiffs Sharp Electronics Corporation,  
Sharp Electronics Manufacturing Company of America, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT) ANTITRUST  
LITIGATION

Case No. 07-cv-05944 (SC)

MDL No. 1917

This Document Relates To:

*Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,*  
No. 13-cv-1173-SC;

*Sharp Elecs. Corp. et al. v. Koninklijke Philips*  
*Elecs. N.V. et al.,* No. 13-cv-2776-SC.

**DECLARATION OF CRAIG A.  
BENSON IN SUPPORT OF  
SHARP'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel  
3 for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America,  
4 Inc. (collectively, "Sharp"). I am a member of the bars of the State of Maryland, the State of New York,  
5 and the District of Columbia, and I am admitted to practice before this court *pro hac vice*.

6 2. I submit this declaration in support of Sharp's Administrative Motion to File Documents  
7 Under Seal. I have personal knowledge of the matters set forth herein and, if called as a witness, I could  
8 and would testify competently to them.

9 3. Pursuant to Civil Local Rules 7-11 and 79-5, Sharp, by and through counsel, respectfully  
10 requests an Order permitting it to file under seal portions of Sharp's Reply Brief re: Motion in Limine to  
11 Exclude Evidence Related to the Role of Sharp Companies in the TFT-LCD Antitrust Litigations, filed  
12 contemporaneously herewith, and Exhibits D, E and F of the Declaration of Craig A. Benson in Support  
13 of Sharp's Reply Brief re: Motion in Limine to Exclude Evidence Related to the Role of Sharp  
14 Companies in the TFT-LCD Antitrust Litigations.

15 4. Attached as Exhibit D is a true and correct copy of the Defendants' Motion to Compel, or to  
16 Modify Prior Stipulation and Order re *LCD* Documents, dated July 18, 2014, designated by Panasonic as  
17 Highly Confidential.

18 5. Attached as Exhibit E is a true and correct copy of relevant excerpts from the transcript of the  
19 deposition of Dr. Dennis Carlton, dated September 16, 2014, designated by the defendants as  
20 Confidential.

21 6. Attached as Exhibit F is a true and correct copy of relevant excerpts from the Rebuttal Expert  
22 Report of Dr. Jerry A. Hausman, dated September 26, 2014, which refers to materials designated by the  
23 defendants as Highly Confidential.

24 7. Sharp's Reply Brief re: Motion in Limine to Exclude Evidence Related to the Role of Sharp  
25 Companies in the TFT-LCD Antitrust Litigations and Exhibits D, E and F refer to or contain excerpts  
26 from documents that parties have designated as "Confidential" or "Highly Confidential" under the  
27 Stipulated Protective Order [Docket Nos. 306, 1142].

-2-

---

DECLARATION OF CRAIG A. BENSON IN SUPPORT OF SHARP'S ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL

Case No. 07-cv-5944, MDL No. 1917; Case Nos. 13-cv-1173, 13-cv-2776

---

1 8. Accordingly, Sharp requests that the documents identified herein be filed under seal.

2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct. Executed this 6th day of March, 2015, in Washington, DC.

4  
5 /s/ Craig A. Benson

6 Craig A. Benson  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27